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TRAFFIC(U.S.A.)

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TRAFFIC (USA) REPORT ON THE IVORY TRADE

in response to the

PROPOSED ELEPHANT PROTECTION ACT OF 1979, HR 4685

before the

MERCHANT MARINE AND FISHERIES COMMITTEE

July 25-26, 1979

presented by

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Testimony No. 3

WORLD WILDLIFE FUND-U.S.

TRAFFIC (U.S.A.)—Trade Records Analysis of Flora and Fauna in Commerce—is a scientific information-gathering program monitoring trade in wildlife, plants, and their products. It is funded by World Wildlife Fund-U.S.

TRAFFIC (USA) is a scientific, information gathering organization funded entirely by the World Wildlife Fund - US. We monitor trade in endangered and commercially exploited species of fauna and flora. World Wildlife Fund - US is an independent conservation organization, organized in the United States and headquartered at 1601 Connecticut Avenue, Washington, D.C. Today, we will provide quantitative data on the worldwide trade in elephant ivory based on official trade statistics and CITES reports. The discrepancies between these figures will be revealed and discussed and an evaluation made of the present record keeping system in the United States.

First, we would like to put the ivory trade and its related problems into the proper perspective. We are not only discussing an elephant derivative, but a rare commodity, the bullion of wildlife products. There is a striking similarity between gold and ivory and the sharp increase in value they have both experienced as a result of worldwide recession. Both ivory workers and goldsmiths are being forced out of business because they can no longer afford to buy such a speculative commodity.

We strongly support the findings and conclusions of Dr. Iain Douglas-Hamilton and Mr. Ian Parker.[1] We agree that while severely threatened outside national parks and sometimes too crowded within them, elephants are <u>not</u> an endangered species. The joint effects of poaching and culling are certainly reflected in the export

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[1] The World Wildlife Fund - US has contributed $50,000 to Dr. Douglas-Hamilton's research on elephants.

figures of many African nations although it is often difficult to determine which of the two is greater. One thing is fairly obvious - African nations will continue to export ivory as long as there are consumers ... and elephants.

In 1976, 1,255,919 kg of raw ivory (unworked) was imported by consumer countries and 976,859 kg in 1977 (Table 1). Ian Parker estimates that the ivory yield per elephant is 17.37 kg (avg. tusk weight - 9.65 kg X 1.8 tusks per elephant), an average representing tusk weights from elephant populations all over Africa. If we convert kilograms of raw ivory into number of elephants: an estimated 72,304 elephants were killed for their ivory in 1976 and 56,238 elephants in 1977.[2]

Most African countries with endemic elephant populations do not provide official ivory export figures, but by adding raw ivory totals from importing countries, a fairly good estimate can be reached. African nations exported 1,006,987 kg (approximately 57,968 elephants) of raw ivory in 1976, and 710,703 kg (approximately 40,916 elephants) in 1977. For instance, Kenya Uganda and Tanzania listed exports for 1976. However, the discrepancy between their export figures and the sum total of ivory imported by other countries is a staggering 460,709 kg (estimated 26,523 elephants). Why such a wide margin of error? Improper labelling? Laundering of documents? Poaching? Who is to say for sure.

The United States is a consumer country. It imported 35,108 kg, 2.8 per cent of the world trade in raw ivory in 1976, and

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[2] These figures may be overestimated since some of this ivory is certainly re-exported within the same year to another country listing it.

15,375 kg, 1.6 per cent of all raw ivory traded, in 1977. The amount of raw ivory imported into the United States has decreased since 1977, while the price has more than doubled over the last year (Table 2). It should be pointed out, however, that the United States is largely an importer of worked ivory rather than raw ivory (Table 3).[3] The estimated number of elephants required for worked ivory products imported into the U.S. in 1977 was between 2,258 and 3,090 and between 1,935 and 4,819 elephants in 1978 (total weight imported/17.37 kg of ivory per elephant). For the first five months of 1979, the United States imported over two million dollars worth of worked ivory pieces (estimated 546 to 658 elephants). In total the U.S. was responsible for importing an estimated 42,646 to 92,734 kg of raw and worked ivory in 1978 which represents between 2,455 and 5,339 elephants.

Attached to this report are 3 tables summarizing the world trade in ivory in 1976 and 1977, and the U.S. import figures on raw and worked ivory. From these data we can state that the major exporters of raw ivory are the Sudan, South Africa, Kenya, Tanzania, Central African Empire, Zambia, Congo, Uganda and Burundi. Raw ivory is then re-exported mainly from Hong Kong, West and East Germany, France, Korea, and Belgium and imported by Japan, Hong Kong, West Germany, Spain, France and to a lesser extent the UK, U.S., Taiwan and Singapore. Raw ivory is worked in West Germany, the United States, Hong Kong, China, Japan and Singapore.

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[3] The U.S. imports of worked ivory products from official statistics are reported in dollars. To convert to kilograms, the total value is divided by 3 which is the average markup of a finished product, and then divided by the cost/kg of raw ivory (Hallagan, pers. comm.). From 1977 - 1979, the cost of ivory in the U.S. was $28.62, $28.38, and $58.62, respectively, and in Japan, $39.17, $70.67, $70.67 (1978 cost/kg used for 1979).

The Bill presently being discussed on elephant ivory imports (HR 4685) is a bill strongly favoring elephant conservation and should be commended. If passed, this bill, if it is to be effective, will rely mainly on U.S. record keeping systems and other foreign countries. Instead of giving the decision making power to the Department of Interior of what countries can and cannot export ivory to the United States, following the proposed six month ban of all ivory, we suggest only countries party to CITES be allowed to export ivory products to the U.S. This is similar to current law which was passed in June 1978. To further insure that elephants are not being poached or mis-managed in CITES signatory countries, the United States should require yearly CITES reports from all these countries and also re-exporting countries, and that the exports of ivory be in balance with importing figures from other countries. Thus, Hong Kong would have to supply a report ot the Secretariat of CITES, which they have yet to do, before they could re-export ivory to the U.S., and Kenya would have to keep a tighter control of its export figures so that the amount of ivory exported correlated more closely with the amount imported by other countries.

Non-CITES countries may oppose this proposal, but we feel that any country which has a strong conservation program in effect would wish to be party to the Convention. The CITES agreement allows the U.S. to place pressure on foreign countries that are exploiting wildlife and not maintaining adequate conservation efforts. By not importing fauna or flora from non-CITES countries, the United States effectively puts pressure on them.

One of the best features of CITES is the submission of annual reports by each party listing all their imports and exports of Appendix I and II species and their parts and/or products. Since most countries in their official statistics including the U.S. tend to lump imports and exports of many wildlife products in one general category (eg.- Alligator and crocodile skins placed in the category reptile skins), CITES reports monitor the trade of all endangered and threatened species. If one CITES country were to underestimate the number of exports, this will show up in the reports by other CITES importing countries. Discrepancy problems and outright negligence of the Convention are reviewed by the CITES Secretariat.

At present while many of the large and conservation conscious countries have already published their 1978 CITES reports, the United States' report will not be available until October 1979. The U.S. Permit Office handling all CITES permit requests and record keeping for Appendix I and II species is understaffed. As a result, it sometimes takes up to three months before an import or export permit request is granted or denied. In most cases, foreign companies are unwilling to wait so long to market their products and choose other outlets. At the alligator hearings of ESSA on July 10, 1979, one tanner told TRAFFIC (USA) the reason foreign countries did not want American alligator hides was because the length of time it took to obtain the export permit. A state of affairs hardly conducive to an improved balance of payment!

There is at present another problem with the record keeping system of wildlife products imported into the United States. The 3-177 Declaration of Import forms are currently stored at the

ports of entry and a separate CITES permit for Appendix I and II imports sent to the U.S. Permit Office in Arlington, Virginia. In many cases the CITES permit will state the item imported and exporting country, but not have country of origin, quantity or value of the item. To take one specific case in 1978 regarding Appendix II crocodile imports, the 3-177 forms held in Miami reported 23,867 live caimans from Panama passing through this port while the U.S. CITES permits showed 2,278 live caimans and 12 shipments of unknown quantity.

It has been rumored that all 3-177 forms and attached documents (CITES permit) will be sent directly to the USDI Law Enforcement office in Washington, D.C., and then stored at the Permit Office. This would be more expedient and it would make it easier to pick up violations of wildlife importations. Two problems have come to our attention: 1) imports of ivory from non-CITES countries, and 2) lack of data about the country of origin - both in clear contradiction of existing U.S. regulations. The TRAFFIC (USA) office has volunteered to help analyze the data on the CITES or 3-177 permits to alleviate existing problems.

In conclusion, we need a CITES Convention but we do not yet have the Convention we need. The rate of growth of world trade in endangered or threatened species and their products at the moment far outweighs the enforcement techniques set up to monitor and enforce the Convention it purports to implement. Without adequate funding for additional law enforcement personnel and until the necessary paperwork is carried out properly, the Convention is a hortatory agreement of convenience.

African nations as the producers of ivory need to monitor exports more carefully - Zaire and Kenya have gone so far as to ban exports of ivory. Elephant herds in the 90-odd national parks should be protected more assiduously and culled only when necessary to prevent the irreversible destruction of the habitat. Perhaps federal AID funds could be allocated to implement better elephant conservation policies in African nations if they are prepared to accept outside advice on such a valuable resource.

Meanwhile, in the United States, we should as a member of CITES, encourage a better enforcement of the CITES regulations on a national and international scale. Thank you.

TABLE 1

RAW IVORY IMPORTS AND EXPORTS (KG)

COUNTRY	IMPORT (1976)	EXPORT	IMPORT (1977)	EXPORT
HONG KONG	719,128	227,343	476,202	130,480
JAPAN	310,216	3,027	269,192	3,921
SINGAPORE	10,969	7,847	10,359	6,526
TAIWAN	6,254		9,710	69
UNITED KINGDOM	27,426	31,167	18,827	
WEST GERMANY	70,900	13,900	69,300	13,462
SPAIN	34,000	109	34,000	160
SWITZERLAND	973	7	750	98
FRANCE	17,000	7,000	38,000	10,000
USA	35,035	(1,114)	15,996	(50)
KOREA	(26)		8	49
KENYA		68,738 (415,234)		12,386 (252,208)
SUDAN		(23,717)		(33,177)
S. AFRICA	3,300	(27,134)		(9,205)
TANZANIA		37,020 (62,613)		(37,243)
C. AFR. EMPIRE		(27,951)		(52,717)
ZAIRE		(288,223)		(151,309)
ZAMBIA		(47,468)		(24,583)
BOTSWANA		(4,146)		(2,397)
CONGO		(15,733)		(14,253)

(The figures in parenthesis are the totals derived by analyzing data from other countries when existing data is absent or conflicting with countries' official import/export figures.)

TABLE 1 (CONT.)

RAW IVORY IMPORTS AND EXPORTS (KG)

COUNTRY	IMPORT (1976)	EXPORT	IMPORT (1977)	EXPORT
UGANDA		5,693 (94,313)		(108,998)
CAMEROUN				(7,624)
BURUNDI				(16,989)
NIGERIA		(135)		
IVORY COAST		(230)		
UNITED ARAB EM.		(4,126)		
YEMEN		(2,229)		
INDIA	7,375		(6,964)	
THAILAND	2,495			
INDONESIA	(293)			
ITALY	3,500	100		
NETHERLANDS	(1,985)	(3,725)	(2,321)	(2,430)
BELGIUM	100	100	(6,862)	
AUSTRALIA	(18)			(9,136)
PERU				(1,440)
EAST GERMANY				(21,200)
OTHER COUNTRIES	(4,926)	(50,357)	(18,368)	(44,245)
TOTAL	1,255,919 kg	898,339 kg to 1,359,048 kg	976,859 kg	714,147 kg to 953,969 kg

Source: IUCN/TRAFFIC (unpublished data from official statistics)

TABLE 2

U.S. IMPORTS OF IVORY TUSKS (KG)

COUNTRY	1976	1977	1978	(Jan - May) 1979
KENYA	19,497	1,612	2,149	
TANZANIA	2,420			
REP. S. AFRICA		3,879	3,223	
ZAMBIA			1,665	35
BOTSWANA	2,964		1,442	948
CEN. AFR. EMPIRE			186	
ZAIRE				176
HONG KONG		3,767	53	
INDIA			182	
CHINA			132	
UK				11
CANADA				14
OTHER COUNTRIES	10,227	6,117		
TOTAL (KG)	35,108	15,375	9,032	1,184
TOTAL VALUE ($)	853,000	440,000	256,316	69,413
VALUE/KG (AVG.)	$ 24.30	$ 28.62	$ 28.38	$ 58.62

Source: U.S. Imports, Bureau of Census, U.S. Dept. of Commerce.

TABLE 3

U.S. IMPORTS OF IVORY BEADS AND UNSPECIFIED IVORY PRODUCTS
Value in Dollars (Estimated Weight - KG)

COUNTRY	1977	1978	(Jan - May) 1979
HONG KONG	$ 3,952,000	$ 5,844,605	$ 1,955,000
JAPAN	304,000	638,887	
CHINA	114,000	177,828	2,514
TAIWAN		30,858	8,689
KOREA		106,587	
INDIA		174,766	25,684
UK		45,528	9,792
FRANCE		1,679	
WEST GERMANY		2,059	2,952
SPAIN		400	
ITALY		2,585	
NETHERLANDS		2,986	
BELGIUM		1,544	
GREECE		334	
CANADA		388	
HAITI		10,062	
ARGENTINA		950	
REP. S. AFRICA		24,090	2,101
ZAIRE		5,570	1,566
TANZANIA		5,343	
SUDAN		2,203	
IVORY COAST		1,512	
BOTSWANA		994	2,236
KENYA		44,550	
OTHER COUNTRIES	239,000		
TOTAL VALUE	$ 4,609,000	$ 7,126,308	$ 2,010,534
EST. WEIGHT	(39,222 - 53,680 kg)	(33,613 - 83,701 kg)	(9,483 - 11,432 kg)

Source: U.S. Imports, Bureau of Census, U.S. Dept. of Commerce.